

BURNS BAIR LLP

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*Special Insurance Counsel to the Official Committee
of Unsecured Creditors of The Roman Catholic Diocese
of Rockville Centre, New York*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

THE ROMAN CATHOLIC DIOCESE OF
ROCKVILLE CENTRE, NEW YORK,
Debtor.

Chapter 11

Case No. 20-12345 (MG)

**TWENTY-EIGHTH MONTHLY FEE STATEMENT OF BURNS BAIR LLP,
AS SPECIAL INSURANCE COUNSEL TO THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS FOR PROFESSIONAL SERVICES RENDERED
AND DISBURSEMENTS INCURRED FOR THE PERIOD FROM
FEBRUARY 1, 2023 THROUGH FEBRUARY 28, 2023**

Name of Applicant:	Burns Bair LLP
Authorized to Provide Professional Services to:	Official Committee of Unsecured Creditors
Date of Retention:	Effective October 29, 2020 pursuant to Order dated December 9, 2020 [Docket No. 246]
Period for which compensation and reimbursement is sought:	February 1, 2023 – February 28, 2023
Amount of Compensation sought as actual, reasonable, and necessary:	\$66,481.50 80% of which is \$53,185.20
Amount of Expense Reimbursement sought as actual, reasonable, and necessary:	\$435.30
TOTAL (80% of fees and 100% of costs)	\$53,620.50

This is the Twenty-Eighth Monthly Fee Statement.

PRELIMINARY STATEMENT

Burns Bair LLP (“Burns Bair”), as Special Insurance Counsel to the Official Committee of Unsecured Creditors (the “Committee”) of The Roman Catholic Diocese of Rockville Centre, New York (the “Debtor”), hereby submits this twenty-eighth monthly statement (the “Monthly Statement”) for the period from February 1, 2023 through February 28, 2023 (the “Statement Period”) for payment of professional services rendered and reimbursement of expenses incurred during the Statement Period pursuant to the Court’s *Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* dated November 4, 2020 [Docket No. 129] (the “Interim Compensation Order”). Burns Bair requests: (a) interim allowance and payment of compensation in the amount of \$53,185.20 (80% of \$66,481.50) of fees on account of reasonable and necessary professional services rendered to the Committee by Burns Bair and (b) reimbursement of actual and necessary costs and expenses in the amount of \$435.30.

FEES FOR SERVICES RENDERED DURING THE STATEMENT PERIOD

1. Set forth below is a list of the positions of the Burns Bair professionals and paraprofessionals who provided services to the Committee during the Statement Period, their respective billing rates, and the aggregate hours spent by each professional and paraprofessional in providing services on behalf of the Committee during the Statement Period.

Name	Title	Year of Partnership	Year of Admission	Hourly Rate	Total Hours Billed	Total Compensation
Timothy Burns	Partner	2008	1991	\$975	27.20	\$26,520.00
Jesse Bair	Partner	2020	2013	\$625	33.90	\$21,187.50
Nathan Kuenzi	Associate	N/A	2020	\$420	17.80	\$7,476.00
Brian Cawley	Associate	N/A	2020	\$420	5.40	\$2,268.00
Leakhena Au	Associate	N/A	2020	\$420	17.30	\$7,266.00
Alyssa Turgeon	Paralegal	N/A	N/A	\$360.00	.10	\$36.00
Karen Dempski	Paralegal	N/A	N/A	\$360.00	1.70	\$612.00
Brenda Horn-Edwards	Paralegal	N/A	N/A	\$360.00	3.10	\$1,116.00
TOTAL:					106.50	\$66,481.50

2. The rates charged by Burns Bair for services rendered to the Committee are the same rates that it charges generally for professional services rendered to its non-bankruptcy clients.

A complete itemization of tasks performed by these professionals and paraprofessionals for the Statement Period is annexed hereto as **Exhibit A**.

EXPENSES INCURRED DURING THE STATEMENT PERIOD

3. Set forth below is a categorical list of expenses incurred by Burns Bair during the Statement Period in the course of representing the Committee.

Date	Description	Amount
2/9/2023	Wisconsin Certificate of Good Standing, J. Bair	\$3.05
2/9/2023	Illinois Certificate of Good Standing, T. Burns	\$16.00
2/9/2023	Missouri Certificate of Good Standing, T. Burns	\$16.25
2/16/2023	Pro Hac Vice admission, J. Bair	\$200.00
2/24/2023	Pro Hac Vice admission, T. Burns	\$200.00
	TOTAL:	\$435.30

NOTICE AND OBJECTION PROCEDURES

4. No trustee or examiner has been appointed in these chapter 11 cases. Pursuant to the Interim Compensation Order, Burns Bair has provided notice of this statement upon the following parties (the “Application Recipients”) by electronic or first class mail: (a) the Debtor c/o The Roman Catholic Diocese of Rockville Centre, 50 N Park Ave P.O. Box 9023, Rockville Centre, NY 11571-9023 (Attn: Thomas Renker); (b) the attorneys for the Debtor, Jones Day, 250 Vesey Street, New York, NY 10281 (Attn: Corinne Ball, Esq., Benjamin Rosenblum, Esq. and Andrew M. Butler, Esq.); and (c) the Office of the United States Trustee Region 2, 201 Varick Street, Suite 1006, New York, NY 10014 (Attn: Greg Zipes, Esq. and Shara Cornell, Esq.). Burns Bair submits that no other or further notice need be provided.

5. Pursuant to the Interim Compensation Order, objections to this Monthly Statement, if any, must be served upon the Application Recipients and the undersigned counsel at Burns Bair by **April 14, 2023** (the “Objection Deadline”) setting forth the nature of the objection and the amount of fees or expenses at issue.

6. If no objections to this Monthly Statement are made on or before the Objection Deadline, the Debtor shall pay Burns Bair 80% of the fees and 100% of the expenses set forth

above. To the extent an objection to this Monthly Statement is timely made, the Debtor shall withhold payment of that portion of the Monthly Statement to which the objection is directed and promptly pay the remainder of the fees and disbursements in the percentages set forth above. To the extent such objection is not resolved; it shall be preserved and presented to the Court at the next interim or final fee application hearing.

Dated: March 30, 2023

BURNS BAIR LLP

/s/ Timothy W. Burns

Timothy W. Burns, Esq. (admitted *pro hac vice*)

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*Special Insurance Counsel to the Official
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Catholic Diocese of Rockville Centre, New York*

EXHIBIT A

Burns | Bair

10 E. Doty St., Suite 600
Madison, Wisconsin 53703-3392
608-286-2302
www.BurnsBair.com

The Official Committee of Unsecured Creditors of The Roman Catholic Diocese of Rockville Centre

Issue Date : 3/21/2023
Bill # : 01072

Matter: Insurance

PROFESSIONAL SERVICES RENDERED

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
2/1/2023	Leakhena Au	Supplemental analysis re additional insured entities under Ecclesia policies in connection with Plan issues (1.9);	1.90	\$798.00
2/1/2023	Jesse Bair	Analyze Ecclesia other insured entities (.2); provide instructions to L. Au re additional analysis needed in connection with same (.1); participate in call with B. Michael re same (.2);	0.50	\$312.50
2/1/2023	Timothy Burns	Review correspondence between PSZJ and BB teams re Committee Plan exhibits (.2);	0.20	\$195.00
2/1/2023	Jesse Bair	Correspondence with Evanston and the Debtor re Committee reinstatement as a party in the Evanston district court action (.1);	0.10	\$62.50
2/1/2023	Timothy Burns	Conference with L. Au re potential direct claims against the Diocese's insurers (.1);	0.10	\$97.50
2/1/2023	Jesse Bair	Review G. Greenwood correspondence re finalization of Committee preliminary injunction discovery responses (.1);	0.10	\$62.50
2/1/2023	Jesse Bair	Participate in call with PSZJ team re Plan exhibits (.8);	0.80	\$500.00
2/1/2023	Jesse Bair	Analyze and respond to state court counsel question re Debtor Plan insurance issues (.2);	0.20	\$125.00
2/1/2023	Jesse Bair	Draft amended version of the insurance policies Plan exhibit (.6);	0.60	\$375.00
2/1/2023	Jesse Bair	Review information re PSIP participants in connection with other insured entities analysis (.2);	0.20	\$125.00
2/1/2023	Timothy Burns	Review email from B. Michael re monthly operating report and related filings (.1);	0.10	\$97.50
2/1/2023	Leakhena Au	Continue analyzing case law re particular elements of potential direct claims against the Diocese's insurers (1.8);	1.80	\$756.00
2/1/2023	Timothy Burns	Review correspondence between BB and opposing counsel re intervention in Evanston adversary proceeding (.2);	0.20	\$195.00

2/1/2023	Jesse Bair	Review and edit revised version of the Amended Committee Plan (.7);	0.70	\$437.50
2/1/2023	Jesse Bair	Review the parties' joint sealing request re the Agreed Coverage Summary (.1); review correspondence with the Debtor and Court re same (.1);	0.20	\$125.00
2/1/2023	Jesse Bair	Review revised version of the Committee Trust Agreement (.3);	0.30	\$187.50
2/2/2023	Jesse Bair	Participate in conference with T. Burns re insurance strategy and potential next-steps (.2);	0.20	\$125.00
2/2/2023	Jesse Bair	Review most recent iteration of the Committee amended Plan (.5); draft proposed additional insurance language for inclusion in same (.2);	0.70	\$437.50
2/2/2023	Leakhena Au	Continue drafting memorandum re potential direct claims against the Diocese's insurers (2.0);	2.00	\$840.00
2/2/2023	Leakhena Au	Continue drafting revised version of memorandum re potential direct claims against the Diocese's insurers (.9);	0.90	\$378.00
2/2/2023	Jesse Bair	Review Debtor information re SIRs for non-abuse claims (.1);	0.10	\$62.50
2/2/2023	Jesse Bair	Review revised version of the Committee Disclosure Statement (.5);	0.50	\$312.50
2/2/2023	Jesse Bair	Review agenda for upcoming state court counsel meeting (.1);	0.10	\$62.50
2/2/2023	Jesse Bair	Review correspondence with PSZJ and state court counsel re potential abuse claims reviewers (.1);	0.10	\$62.50
2/2/2023	Jesse Bair	Review correspondence with B. Michael re additional revised insurance language for Amended Committee Plan (.1);	0.10	\$62.50
2/2/2023	Timothy Burns	Participate in conference with J. Bair re insurance strategy and potential next-steps (.2);	0.20	\$195.00
2/2/2023	Jesse Bair	Review revised version of Committee work-in-progress list (.1);	0.10	\$62.50
2/3/2023	Jesse Bair	Review the Diocese's preliminary injunction request for admission responses (.1);	0.10	\$62.50
2/3/2023	Jesse Bair	Review the Diocese's preliminary injunction requests for production responses (.1);	0.10	\$62.50
2/3/2023	Leakhena Au	Analysis re potential revisions to memorandum re potential direct claims against the Diocese's insurers (.2);	0.20	\$84.00
2/3/2023	Jesse Bair	Review B. Michael correspondence to the Committee re the Committee's First Amended Plan and Disclosure Statement (.1);	0.10	\$62.50
2/3/2023	Jesse Bair	Review Arrowood's amended answer, affirmative defenses, and counterclaim (.7);	0.70	\$437.50
2/3/2023	Timothy Burns	Review the Committee's amended disclosure statement (.4);	0.40	\$390.00
2/3/2023	Jesse Bair	Review B. Michael correspondence re draft allocation protocols (.1);	0.10	\$62.50
2/3/2023	Jesse Bair	Review final version of the Committee's preliminary injunction discovery responses to the Diocese (.1);	0.10	\$62.50

2/3/2023	Jesse Bair	Review the Diocese's preliminary injunction interrogatory responses (.2);	0.20	\$125.00
2/3/2023	Jesse Bair	Review the Diocese's answer to Arrowood's amended counterclaim (.2);	0.20	\$125.00
2/3/2023	Jesse Bair	Review Order granting the parties' joint motion to seal and redacted Agreed Coverage Summary (.1);	0.10	\$62.50
2/3/2023	Timothy Burns	Review correspondence between PSZJ and state court counsel re Committee plan disclosure issues (.2);	0.20	\$195.00
2/3/2023	Jesse Bair	Participate in state court counsel meeting re ongoing case issues (1.2);	1.20	\$750.00
2/3/2023	Leakhena Au	Continue analyzing factual information regarding potential direct claims against the Diocese's insurers (2.0);	2.00	\$840.00
2/3/2023	Karen DempSKI	Download/upload recently produced Diocesan discovery production (.4);	0.40	\$144.00
2/3/2023	Leakhena Au	Continue analyzing legal issues in connection with potential direct claims against the Diocese's insurers (1.1);	1.10	\$462.00
2/3/2023	Timothy Burns	Review emails between PSZJ and BB re first amended plan draft (.2);	0.20	\$195.00
2/3/2023	Timothy Burns	Participate in state court counsel meeting re ongoing case issues (1.2);	1.20	\$1,170.00
2/3/2023	Timothy Burns	Review correspondence from PSZJ to the Committee re amended disclosure statement (.1);	0.10	\$97.50
2/5/2023	Jesse Bair	Analyze and respond to K. Brown question re Diocese preliminary injunction responses re Arrowood (.2);	0.20	\$125.00
2/6/2023	Leakhena Au	Continue analyzing factual information regarding potential direct claims against the Diocese's insurers (1.2);	1.20	\$504.00
2/6/2023	Jesse Bair	Review the Diocese's omnibus objection to released or dismissed claims (.2); review associated Renker declaration (.1);	0.30	\$187.50
2/6/2023	Leakhena Au	Participate in internal BB team conference re assignments and case developments (.1);	0.10	\$42.00
2/6/2023	Nathan Kuenzi	Participate in internal BB team conference re case status and associated research projects (.1);	0.10	\$42.00
2/6/2023	Nathan Kuenzi	Analyze POC information in connection with ongoing case insurance issues (.4);	0.40	\$168.00
2/6/2023	Timothy Burns	Participate in internal BB team conference re assignments and case developments (.1);	0.10	\$97.50
2/6/2023	Brian Cawley	Participate in team meeting regarding case status and assignments (.1);	0.10	\$42.00
2/6/2023	Alyssa Turgeon	Participate in internal BB team conference re case status and associated research projects (.1);	0.10	\$36.00
2/6/2023	Leakhena Au	Continue analyzing legal issues in connection with potential direct claims against the Diocese's insurers (1.1);	1.10	\$462.00
2/6/2023	Jesse Bair	Participate in internal BB team conference re case status and associated research projects (.1);	0.10	\$62.50

2/6/2023	Jesse Bair	Review the Debtor's omnibus objection to duplicate or amended claims (.2);	0.20	\$125.00
2/7/2023	Timothy Burns	Review claim withdrawal filed by particular state court counsel.1);	0.10	\$97.50
2/7/2023	Jesse Bair	Correspondence with Evanston re Committee reinstatement as a party in the Evanston district court action (.1);	0.10	\$62.50
2/7/2023	Leakhena Au	Continue analyzing factual information regarding potential direct claims against the Diocese's insurers (2.0);	2.00	\$840.00
2/7/2023	Timothy Burns	Review emails between BB and PSZJ re preliminary injunction opposition brief edits (.1);	0.10	\$97.50
2/7/2023	Jesse Bair	Provide instructions to B. Horn re preparing draft of BB's seventh interim fee application (.1);	0.10	\$62.50
2/7/2023	Jesse Bair	Review correspondence with B. Michael and the Committee re potential Department of Education counter (.1);	0.10	\$62.50
2/7/2023	Jesse Bair	Review correspondence from the Court and K. Brown re February 21 Plan-related status conference (.1);	0.10	\$62.50
2/7/2023	Timothy Burns	Review PSIP monthly information received from the Diocese (.1);	0.10	\$97.50
2/7/2023	Timothy Burns	Review correspondence from B. Michael to Committee re DOE settlement discussions (.1);	0.10	\$97.50
2/7/2023	Leakhena Au	Draft revised memorandum re potential direct claims against the Diocese's insurers in light of supplemental research results (1.8);	1.80	\$756.00
2/7/2023	Jesse Bair	Review debtor monthly PSIP information (.1);	0.10	\$62.50
2/7/2023	Leakhena Au	Review insurer coverage position letters in connection with potential direct claims against the Diocese's insurers (1.0);	1.00	\$420.00
2/8/2023	Jesse Bair	Correspondence with Evanston re Committee reinstatement as a party in the Evanston district court action (.1);	0.10	\$62.50
2/8/2023	Nathan Kuenzi	Begin supplemental analysis re the impact, if any, of prosecution of particular state court actions in connection with preliminary injunction briefing (2.2);	2.20	\$924.00
2/8/2023	Jesse Bair	Review notice of hearing re February 21 status conference (.1);	0.10	\$62.50
2/8/2023	Nathan Kuenzi	Participate in conference with J. Bair re preliminary injunction state court action insurance impacts, if any, and supplemental analysis needed in connection with same (.2);	0.20	\$84.00
2/8/2023	Jesse Bair	Draft proposed stipulation and Order reinstating the Committee as a party in the Evanston district court action (.3); correspondence with PSZJ team re same (.1);	0.40	\$250.00

2/8/2023	Jesse Bair	Review and respond to correspondence with G. Greenwood re preliminary injunction state court action insurance impacts (.2); participate in conference with N. Kuenzi re supplemental analysis needed in connection with same (.2);	0.40	\$250.00
2/9/2023	Jesse Bair	Review and respond to correspondence with I. Nasatir and K. Brown re upcoming preliminary injunction depositions (.2);	0.20	\$125.00
2/9/2023	Jesse Bair	Review correspondence from B. Michael re the Diocese's most recent round of claim objections (.1);	0.10	\$62.50
2/9/2023	Nathan Kuenzi	Continue supplemental analysis re the impact, if any, of prosecution of particular state court actions in connection with preliminary injunction briefing (1.9);	1.90	\$798.00
2/9/2023	Jesse Bair	Review portion of the Diocese's recent preliminary injunction document production (.1);	0.10	\$62.50
2/9/2023	Jesse Bair	Correspondence with Evanston and the Debtor re draft stipulation and Order reinstating the Committee as a party in the Evanston district court action (.1);	0.10	\$62.50
2/9/2023	Karen DempSKI	Draft pro hac vice submissions for T. Burns and J. Bair in the Evanston district court action (.8);	0.80	\$288.00
2/9/2023	Jesse Bair	Review agenda for upcoming state court counsel meeting (.1);	0.10	\$62.50
2/10/2023	Nathan Kuenzi	Continue supplemental analysis re the impact, if any, of prosecution of particular state court actions in connection with preliminary injunction briefing (3.0);	3.00	\$1,260.00
2/10/2023	Jesse Bair	Review correspondence with K. Brown and the Diocese re upcoming preliminary injunction depositions (.1);	0.10	\$62.50
2/11/2023	Timothy Burns	Review recent NY court decision on negligent retention and supervision claims re sexual abuse (.3);	0.30	\$292.50
2/11/2023	Timothy Burns	Review email between B. Michael and state court counsel re preliminary injunction briefing issues (.1);	0.10	\$97.50
2/11/2023	Timothy Burns	Review debtor's fifth omnibus objection and supporting declaration (.2);	0.20	\$195.00
2/11/2023	Timothy Burns	Review Cemetery tolling stipulation and notice (.1);	0.10	\$97.50
2/11/2023	Timothy Burns	Review correspondence from E. Stephens re preliminary injunction deposition scheduling and topics of diocesan witnesses (.1);	0.10	\$97.50
2/11/2023	Timothy Burns	Review correspondence between PSZJ and BB re claims objections (.2);	0.20	\$195.00
2/11/2023	Timothy Burns	Review draft claims objection response (.1);	0.10	\$97.50
2/11/2023	Timothy Burns	Review email from B. Michael re claims objections procedures (.1);	0.10	\$97.50
2/11/2023	Timothy Burns	Review correspondence between PSZJ and state court counsel re potential plan trustees (.1);	0.10	\$97.50
2/12/2023	Jesse Bair	Correspondence with I. Nasatir and B. Michael re insurance impacts, if any, of certain Diocese claims objections (.1); correspondence with T. Burns re same (.1);	0.20	\$125.00

2/12/2023	Jesse Bair	Analysis re strategy for upcoming insurance-related preliminary injunction depositions (.2);	0.20	\$125.00
2/12/2023	Jesse Bair	Review first amended stipulated tolling agreements with the DOE, Seminary, and Gemco (.1);	0.10	\$62.50
2/12/2023	Jesse Bair	Review the Diocese's fifth omnibus claims objection (.2); review Renker declaration in support of same (.1);	0.30	\$187.50
2/12/2023	Jesse Bair	Analysis re insurer information in connection with claim objection issues (.5); correspondence with B. Michael re same (.1);	0.60	\$375.00
2/12/2023	Jesse Bair	Review correspondence from the Committee re ongoing case issues (.1);	0.10	\$62.50
2/13/2023	Jesse Bair	Conference with T. Burns re insurance impacts, if any, of certain Diocese claims objections (.2);	0.20	\$125.00
2/13/2023	Timothy Burns	Participate in call with J. Bair re insurance impacts, if any, of certain Diocese claims objections (.2);	0.20	\$195.00
2/13/2023	Jesse Bair	Review email summary from N. Kuenzi re supplemental analysis of CVA action insurance impacts (.1); participate in conference with N. Kuenzi re same and additional analysis needed in connection with the Committee's preliminary injunction opposition brief (.4);	0.50	\$312.50
2/13/2023	Jesse Bair	Review agenda for upcoming Committee meeting (.1);	0.10	\$62.50
2/13/2023	Nathan Kuenzi	Additional analysis re the impact, if any, of prosecution of particular state court actions in connection with preliminary injunction briefing (4.8);	4.80	\$2,016.00
2/13/2023	Jesse Bair	Review correspondence with state court counsel re future claim issues (.1);	0.10	\$62.50
2/13/2023	Nathan Kuenzi	Prepare for meeting with J. Bair (.1); participate in conference with J. Bair re additional analysis needed in connection with the Committee's preliminary injunction opposition brief (.4);	0.50	\$210.00
2/14/2023	Jesse Bair	Participate in call with N. Kuenzi re results of supplemental analysis re insurance impact, if any, of litigation of particular state court actions again non-debtor co-defendants (.1);	0.10	\$62.50
2/14/2023	Timothy Burns	Participate in portion of Committee meeting re plan issues (.6);	0.60	\$585.00
2/14/2023	Nathan Kuenzi	Finalize supplemental analysis re the impact, if any, of prosecution of particular state court actions in connection with preliminary injunction briefing (4.5);	4.50	\$1,890.00
2/14/2023	Jesse Bair	Analyze email memorandum from N. Kuenzi re supplemental analysis re insurance impact, if any, of litigation of particular state court actions again non-debtor co-defendants (.2);	0.20	\$125.00
2/14/2023	Nathan Kuenzi	Prepare for meeting with J. Bair (.1); participate in conference with J. Bair re supplemental analysis re insurance impact, if any, of litigation of particular state court actions again non-debtor co-defendants (.1);	0.20	\$84.00
2/14/2023	Jesse Bair	Participate in portion of Committee meeting re ongoing Plan issues (.2);	0.20	\$125.00

2/14/2023	Jesse Bair	Review and edit proposed stipulation and order reinstating the Committee as a party in the Evanston district court action (.1);	0.10	\$62.50
2/14/2023	Jesse Bair	Draft letter to the Court regarding the Committee's reinstatement as party in the Evanston district court action (.4); correspondence with the Debtor and Evanston re same (.1);	0.50	\$312.50
2/14/2023	Jesse Bair	Additional analysis re the insurance impact, if any, of litigation of particular state court actions again non-debtor co-defendants (.2); draft correspondence to G. Greenwood summarizing findings re same (.3);	0.50	\$312.50
2/14/2023	Jesse Bair	Review and edit draft pro hac vice submissions in the Evanston district court action (.1);	0.10	\$62.50
2/14/2023	Jesse Bair	Review correspondence with state court counsel re future claim issues (.1);	0.10	\$62.50
2/15/2023	Timothy Burns	Participate in call with J. Bair re preliminary injunction hearing and related deposition strategy (.2);	0.20	\$195.00
2/15/2023	Jesse Bair	Participate in conference with G. Greenwood re preliminary injunction insurance issues (.2); review follow-up correspondence with G. Greenwood re same (.1);	0.30	\$187.50
2/15/2023	Jesse Bair	Correspondence with PSZJ re upcoming preliminary injunction depositions (.2); participate in call with T. Burns re preliminary injunction hearing and related deposition strategy (.2);	0.40	\$250.00
2/15/2023	Jesse Bair	Review B. Michael correspondence re February 21 Plan-related status conference (.1);	0.10	\$62.50
2/15/2023	Jesse Bair	Review recent appellate decision re insurer lack of standing to object to post-confirmation litigation trust (.5);	0.50	\$312.50
2/15/2023	Timothy Burns	Brief review of recent appellate decision re insurance neutrality of Plan issues (.2);	0.20	\$195.00
2/16/2023	Jesse Bair	Review Committee draft deposition notices to Porter, Moore, and Stephens (.1);	0.10	\$62.50
2/16/2023	Brenda Horn	Draft BB monthly fee statement (.6); generate and edit Exhibit A to same (.1); correspond with J. Bair re same (.1);	0.80	\$288.00
2/16/2023	Brenda Horn	Draft BB seventh interim fee application (1.2), revise declaration of T. Burns re same (.2); draft related exhibits (.8); correspond with J. Bair re same (.1);	2.30	\$828.00
2/16/2023	Karen DempSKI	Finalize and file pro hac vice submissions in Evanston district court action (.2); email J. Bair re same (.1);	0.30	\$108.00
2/16/2023	Jesse Bair	Participate in state court counsel meeting re Plan and other ongoing case issues (1.0);	1.00	\$625.00
2/16/2023	Jesse Bair	Correspondence with Evanston and the Diocese re finalization of Committee reinstatement stipulation and letter to the Court (.1); correspondence with K. DempSKI re finalizing and filing same and J. Bair pro hac vice materials (.1);	0.20	\$125.00

2/16/2023	Jesse Bair	Review the Diocese's amended complaint in the LMI district court action (.3); review LMI and Interstate's motions for extension to respond to same (.1);	0.40	\$250.00
2/16/2023	Jesse Bair	Correspondence with B. Horn re BB's seventh interim fee application (.1);	0.10	\$62.50
2/16/2023	Jesse Bair	Review materials re recent Diocesan insurance activities (.2);	0.20	\$125.00
2/16/2023	Jesse Bair	Participate in weekly conference with PSZJ team re case strategy and ongoing litigation tasks (.9);	0.90	\$562.50
2/17/2023	Jesse Bair	Review the Committee's motion to amend the claim objection procedures and notice of hearing re same (.2);	0.20	\$125.00
2/17/2023	Jesse Bair	Review various correspondence with B. Michael and state court counsel re future claim and Plan issues (.2);	0.20	\$125.00
2/18/2023	Timothy Burns	Review correspondence between PSZJ and state court counsel re future claims representative issues (.2);	0.20	\$195.00
2/19/2023	Jesse Bair	Review correspondence with B. Michael and the Committee re future claim issues (.1);	0.10	\$62.50
2/20/2023	Jesse Bair	Review B. Michael correspondence re claim objection issues (.1);	0.10	\$62.50
2/20/2023	Jesse Bair	Review correspondence with B. Michael and state court counsel re future claim and Plan issues (.1);	0.10	\$62.50
2/20/2023	Jesse Bair	Analyze recent New York decision re negligent supervision liability for sexual abuse claims (.4).	0.40	\$250.00
2/21/2023	Jesse Bair	Review agenda for upcoming Committee meeting (.1);	0.10	\$62.50
2/21/2023	Jesse Bair	Participate in portion of Committee meeting re ongoing case issues (.5);	0.50	\$312.50
2/21/2023	Jesse Bair	Review Order granting LMI and Lexington's motion for extension of time to respond to the Diocese's amended complaint (.1);	0.10	\$62.50
2/21/2023	Timothy Burns	Participate in portion of Committee meeting re ongoing case issues (.7);	0.70	\$682.50
2/21/2023	Jesse Bair	Attend court status hearing re competing Plans (.7); participate in post-hearing conference with T. Burns re outcome of same and potential next-steps (.1);	0.80	\$500.00
2/21/2023	Timothy Burns	Attend court status hearing re competing Plans (.7); participate in post-hearing conference with J. Bair re outcome of same and potential next-steps (.1);	0.80	\$780.00
2/21/2023	Jesse Bair	Review Diocese letter re IRCP document production (.1);	0.10	\$62.50
2/21/2023	Jesse Bair	Review the Diocese's sixth omnibus claims objection (.2); review Renker declaration in support of same (.1);	0.30	\$187.50
2/21/2023	Jesse Bair	Review final version of Committee preliminary injunction deposition notices served on the Diocese (.1);	0.10	\$62.50
2/22/2023	Jesse Bair	Review most recent version of the Committee's work-in-progress litigation task list (.1);	0.10	\$62.50
2/22/2023	Jesse Bair	Review the Diocese's seventh omnibus claims objection (.1);	0.10	\$62.50

2/22/2023	Jesse Bair	Review correspondence with PSZJ and state court counsel re call to discuss potential judicial mediator (.1); review information re the Diocese's suggested candidate for judicial mediator (.1);	0.20	\$125.00
2/22/2023	Jesse Bair	Review and edit initial draft of the Committee's first omnibus objection to affiliate claims (.6); review J. Elkins edits to same (.1); review J. Stang edits to same (.1); review additional correspondence with PSZJ re potential edits to same (.1);	0.90	\$562.50
2/23/2023	Jesse Bair	Review correspondence with the Debtor and PSZJ re potential judicial mediators (.1);	0.10	\$62.50
2/23/2023	Jesse Bair	Begin reviewing survivor response to the Diocese's fourth omnibus claims objection (.3);	0.30	\$187.50
2/23/2023	Jesse Bair	Review correspondence with G. Greenwood and K. Brown re DOE settlement status (.1);	0.10	\$62.50
2/23/2023	Timothy Burns	Brief review re the Diocese's sixth omnibus claims objection (.1); brief review re the Diocese's seventh omnibus claims objection (.1);	0.20	\$195.00
2/23/2023	Jesse Bair	Participate in conference with PSZJ re work in progress issues and mediation strategy (1.8);	1.80	\$1,125.00
2/23/2023	Jesse Bair	Brief review re recent Diocese preliminary injunction document production (.1);	0.10	\$62.50
2/23/2023	Jesse Bair	Review Order reinstating the Committee as a party to the Evanston district court action and correspond with PSZJ re same (.1);	0.10	\$62.50
2/23/2023	Jesse Bair	Prepare for state court counsel meeting re judicial mediator issues (.1); participate in state court counsel meeting re same (.6);	0.70	\$437.50
2/23/2023	Timothy Burns	Review the Committee's draft affiliate claims objection motion (.4);	0.40	\$390.00
2/23/2023	Timothy Burns	Review email from B. Michael re mediator selection issues (.1);	0.10	\$97.50
2/24/2023	Timothy Burns	Review Committee reinstatement order in Evanston district court action (.1);	0.10	\$97.50
2/24/2023	Jesse Bair	Analyze proposed preliminary injunction insurance exhibits (.4); correspondence with G. Greenwood re potential edits to same (.2); review revised versions of preliminary injunction insurance exhibits (.3); additional correspondence with G. Greenwood re same (.1); review draft correspondence from G. Greenwood to the Diocese re same (.1);	1.10	\$687.50
2/24/2023	Jesse Bair	Review correspondence with state court counsel and K. Dine re judicial mediator issues (.2);	0.20	\$125.00
2/24/2023	Timothy Burns	Email to J. Bair re insurance analysis assignment (.1);	0.10	\$97.50
2/24/2023	Jesse Bair	Participate in conference with T. Burns re judicial mediator selection issues (.1);	0.10	\$62.50
2/24/2023	Timothy Burns	Review correspondence from G. Greenwood re preliminary injunction exhibits (.1);	0.10	\$97.50
2/24/2023	Timothy Burns	Review correspondence from PSZJ re mediator selection (.1);	0.10	\$97.50

2/24/2023	Timothy Burns	Prepare for state court counsel meeting (.1); Participate in state court counsel meeting re mediation issues (.6); participate in post-call with PSZJ and J. Bair re outcome of state court counsel meeting and next-steps (.1);	0.80	\$780.00
2/24/2023	Jesse Bair	Participate in state court counsel meeting re mediation issues (.6); participate in post-call with PSZJ and T. Burns re outcome of state court counsel meeting and next-steps (.1);	0.70	\$437.50
2/24/2023	Timothy Burns	Initial review of Merson plaintiffs' opposition to Diocese's fourth omnibus claim objection (.8);	0.80	\$780.00
2/24/2023	Timothy Burns	Review pro hac vice submission in Evanston district court action (.1);	0.10	\$97.50
2/24/2023	Karen DempSKI	Finalize and file pro hac vice submission for T. Burns in Evanston district court action (.2);	0.20	\$72.00
2/24/2023	Timothy Burns	Review correspondence from state court counsel re mediator selection issues (.2);	0.20	\$195.00
2/24/2023	Timothy Burns	Additional analysis re mediator selection issue (.1);	0.10	\$97.50
2/24/2023	Timothy Burns	Review correspondence from K. Brown re DOE negotiation status (.1);	0.10	\$97.50
2/24/2023	Jesse Bair	Continue reviewing survivor response to the Diocese's fourth omnibus claims objection and related exhibits (.3); correspondence with T. Burns re associate research project re potential insurance impact, if any, of claim objection issues (.1); provide instructions to B. Cawley re same (.2);	0.60	\$375.00
2/24/2023	Timothy Burns	Review correspondence from G. Greenwood re DOE negotiations (.1);	0.10	\$97.50
2/24/2023	Jesse Bair	Review correspondence with state court counsel re potential judicial mediator (.1);	0.10	\$62.50
2/24/2023	Brian Cawley	Conference with J. Bair re potential insurance impact, if any, of claim objection issues (.2); conduct supplemental research on New York expected/intended and late notice law (.6);	0.80	\$336.00
2/25/2023	Timothy Burns	Review correspondence from G. Greenwood to Jones Day re preliminary injunction hearing exhibits (.1);	0.10	\$97.50
2/25/2023	Jesse Bair	Review PSZJ memo re case next-steps re Plan and Disclosure Statement process (.1);	0.10	\$62.50
2/25/2023	Leakhena Au	Analysis re insurance assignment issues (.2);	0.20	\$84.00
2/25/2023	Jesse Bair	Review PSZJ memo re status of FCC and cell tower sales (.1);	0.10	\$62.50
2/25/2023	Jesse Bair	Review correspondence with PSZJ and state court counsel re preliminary injunction issues and next-steps with case litigation (.1);	0.10	\$62.50
2/25/2023	Jesse Bair	Review PSZJ letter to the Diocese re cell tower bid issues (.1);	0.10	\$62.50
2/25/2023	Timothy Burns	Review draft stipulation re preliminary injunction evidence (.1); review related correspondence with G. Greenwood re same (.1);	0.20	\$195.00

2/26/2023	Timothy Burns	Review and suggest revisions to draft opposition to PI Motion, along with review of case law related to jurisdictional and merits aspects of motion (4.1);	4.10	\$3,997.50
2/26/2023	Jesse Bair	Review T. Burns correspondence re potential insurance addition to the Committee's preliminary injunction opposition brief (.1);	0.10	\$62.50
2/26/2023	Jesse Bair	Review additional correspondence with PSZJ and state court counsel re preliminary injunction issues and next-steps with case litigation (.1);	0.10	\$62.50
2/27/2023	Jesse Bair	Review information regarding the Diocese's most recent suggestion for a judicial mediator (.1); review correspondence with PSZJ and state court counsel re same (.1);	0.20	\$125.00
2/27/2023	Timothy Burns	Further review of case law regarding preliminary injunction issues, including jurisdiction and automatic stay issues (3.2); review of cases and analysis re SIR issues, if any, for Committee plan analysis purposes (.9); review of case law re cooperation duties re Plan issues (1.6); analyze case law re good faith requirement and TDPs re Committee plan issues (2.2);	7.90	\$7,702.50
2/27/2023	Jesse Bair	Review draft outline for deposition of C. Moore (.4); review correspondence with J. Stang and state court counsel re same (.1);	0.50	\$312.50
2/27/2023	Brian Cawley	Continue analyzing late notice and expected/intended issues under N.Y. law (1.3); analyze claim objection briefing in connection with impact, if any, on insurer coverage defenses (1.5);	2.80	\$1,176.00
2/27/2023	Jesse Bair	Correspondence with B. Michael re additional insured questions (.1);	0.10	\$62.50
2/27/2023	Jesse Bair	Review draft stipulation regarding the admissibility of certain proposed preliminary injunction exhibits (.1); related analysis re additional potential insurance policy exhibits (.1);	0.20	\$125.00
2/27/2023	Jesse Bair	Review revised draft of the Committee's first omnibus objection to parish POCs (.3);	0.30	\$187.50
2/28/2023	Jesse Bair	Participate in conference with T. Burns re preparations and strategy re upcoming Porter deposition (.1);	0.10	\$62.50
2/28/2023	Jesse Bair	Participate in conference with I. Nasatir re insurance Plan issues (.2);	0.20	\$125.00
2/28/2023	Jesse Bair	Review correspondence with B. Michael and state court counsel re judicial mediator issues (.1);	0.10	\$62.50
2/28/2023	Jesse Bair	Participate in additional conference with I. Nasatir re insurance mediation issues (.2);	0.20	\$125.00
2/28/2023	Jesse Bair	Review correspondence with B. Michael and the Committee re case update (.1);	0.10	\$62.50

2/28/2023	Timothy Burns	Further review of cases re good faith requirement and TDPs re UCC plan issues (3.7); review correspondence between PSZJ and state court counsel re potential judicial mediators and bio materials (.2); review PSZJ update correspondence to the Committee and state court counsel re ongoing case developments (.1);	4.00	\$3,900.00
2/28/2023	Jesse Bair	Participate in conference with PSZJ and state court counsel re judicial mediator selection, preliminary injunction briefing, and other ongoing litigation issues (.8); participate in post-call with PSZJ re outcome of meeting and next-steps (.1);	0.90	\$562.50
2/28/2023	Brian Cawley	Continue analyzing claim objection briefing in connection with impact, if any, on insurer coverage defenses (.5); draft email memorandum summarizing claim objection analysis results (1.2);	1.70	\$714.00
2/28/2023	Jesse Bair	Review LMI and the Diocese's joint status letter to Judge Cronan (.1);	0.10	\$62.50
Total Hours and Fees			106.50	\$66,481.50

EXPENSES

<u>Date</u>	<u>Description</u>	<u>Amount</u>
2/9/2023	Wisconsin Certificate of Good Standing, J. Bair	\$3.05
2/9/2023	Illinois Certificate of Good Standing, T. Burns	\$16.00
2/9/2023	Missouri Certificate of Good Standing, T. Burns	\$16.25
2/16/2023	Pro Hac Vice admission, J. Bair	\$200.00
2/24/2023	Pro Hac Vice admission, T. Burns	\$200.00
Total Expenses		\$435.30

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Alyssa Turgeon	0.10	\$360.00	\$36.00
Brenda Horn	3.10	\$360.00	\$1,116.00
Brian Cawley	5.40	\$420.00	\$2,268.00
Jesse Bair	33.90	\$625.00	\$21,187.50
Karen DempSKI	1.70	\$360.00	\$612.00
Leakhena Au	17.30	\$420.00	\$7,266.00
Nathan Kuenzi	17.80	\$420.00	\$7,476.00
Timothy Burns	27.20	\$975.00	\$26,520.00

Total Due This Invoice: \$66,916.80